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February 24, 2016

By ECF

Honorable P. Kevin Castel
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: Richardson v. City of New York, et al., 15 cv 5775 (PKC)

Your Honor:

I am a Senior Counsel in the office of Zachary Carter, Corporation Counsel of the City of New York, representing defendants in the above-referenced civil rights matter. Defendants submit this letter to provide an update ahead of the conference set for February 26, 2016.

Retired Officer Scott has consented to accept service at 1 Police Plaza in this matter. Defendants' requests noted in the February 17, 2016 letter remain: that Officer Isaac be included in the R. 12(b) motion *nunc pro tunc*, as Isaac's inclusion does not require modification of any of the arguments already set forth, and that plaintiff's request for an extension of time to file a further amended complaint be denied. Defendants consent to plaintiff's request for time to oppose the motion to dismiss, and defendants take no position with respect to any request for additional time to serve Officer Scott.

Respectfully submitted,

/s/

Andrew Lucas
Senior Counsel

cc: *By ECF*
Dave Thompson
Attorney for Plaintiff